

**OFFICE OF THE FEDERAL PUBLIC DEFENDER  
DISTRICT OF MARYLAND**

NORTHERN DIVISION  
TOWER II, 9<sup>TH</sup> FLOOR  
100 SOUTH CHARLES STREET  
BALTIMORE, MARYLAND 21201-2705  
TEL: (410) 962-3962  
FAX: (410) 962-0872  
TOLL FREE: (855) 213-8450

JAMES WYDA  
FEDERAL PUBLIC DEFENDER

SHARI SILVER DERROW  
ASSISTANT FEDERAL PUBLIC DEFENDER

**VIA CM/ECF**

March 19, 2020

The Honorable Richard D. Bennett  
United States District Court  
for the District of Maryland  
101 West Lombard Street  
Baltimore, Maryland 21201

Re: *United States v. Valleria Rice*  
Criminal Case No. RDB-17-0127

Dear Judge Bennett:

I write to request that the Court issue an order granting Ms. Rice's immediate release from Volunteers of America. United States Probation Officer Rachel Snyder and Assistant United States Attorney Clinton Fuchs do not oppose this request.

As the Court is aware, on February 12, 2020, Ms. Rice appeared before the Court on alleged violations of supervised release. Ms. Rice admitted to being in violation of statutory condition #1 (the defendant shall not commit any federal, state, or local crime), and the Court imposed a sentence of 11 months, with credit for time served in custody since 4/12/19. The Court also imposed a term of supervised release of two years, including a condition that upon Ms. Rice's release from imprisonment, she must serve the first sixty days in a community treatment center.

Ms. Rice was subsequently released from custody and placed in Volunteers of America in Baltimore. She has approximately a month and half remaining on her 60-day placement. However, Ms. Rice has informed undersigned counsel and the Probation Office that the Volunteers of America has been permitting individuals to come in and out of the facility, despite the ongoing health crisis and the continuing spread of the novel coronavirus. Additionally, Ms. Rice has informed undersigned counsel and the Probation Office that at least one woman at Volunteers of America is sick and has been coughing, although she does not know this woman's diagnosis.

Given the exigency of the situation, Probation and the government do not oppose Ms. Rice being released from Volunteers of America or her plan to reside with Keziah Carter at Ms. Carter's residence in Baltimore. I respectfully request that the Court issue an order suspending the

requirement that Ms. Rice complete a 60-day term in a community treatment center and ordering her immediate release from Volunteers of America.

Sincerely,

/s/

Shari Silver Derrow  
Assistant Federal Public Defender